

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE APACHE CORP. SECURITIES
LITIGATION

Case No. 4:21-cv-00575

District Judge George C. Hanks, Jr.

Magistrate Judge Andrew M. Edison

CLASS ACTION

**DECLARATION OF THOMAS R. AJAMIE IN SUPPORT OF LEAD
PLAINTIFFS' MOTION FOR CLASS CERTIFICATION AND APPOINTMENT
OF CLASS REPRESENTATIVES AND CLASS COUNSEL AND
SUPPORTING MEMORANDUM OF LAW**

I, Thomas R. Ajamie, declare as follows:

1. I am a member in good standing of the State Bar of Texas and am admitted to practice before this Court. I am Managing Partner of the law firm Ajamie LLP. I submit this Declaration in support of *Lead Plaintiffs' Motion for Class Certification and Appointment of Class representatives and Class Counsel and Supporting Memorandum of Law*.

2. Attached are true and correct copies of the following exhibits:

Exhibit A: The Expert Report of Dr. Zachary Nye, Ph.D., dated April 7, 2023, along with its exhibits

Exhibit B: Firm résumé of Saxena White P.A.

Exhibit C: Firm résumé of Kessler Topaz Meltzer & Check, LLP

Exhibit D: Firm résumé of Ajamie LLP

3. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed this 7th day of April, 2023

s/ Thomas R. Ajamie

Thomas R. Ajamie